

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

ASHLY ALEXANDER, CEDRIC BISHOP,
AMY THOMAS-LAWSON, WILLIAM GREEN,
BRENDA BOLEY, MIGUEL PADILLA, and
VICTORIA DAWKINS

*On behalf of themselves individually and
similarly situated persons,*

Plaintiffs,

Case No. 1:20-cv-02369-RDB

v.

CARRINGTON MORTGAGE SERVICES,
LLC,

Defendants.

**MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Plaintiffs Ashly Alexander, Cedric Bishop, Amy Thomas-Lawson, William Green, Brenda Boley, Miguel Padilla, and Victoria Dawkins (hereinafter, “Plaintiffs”), through counsel and pursuant to Fed. R. Civ. P. 23, move this Court for preliminary approval of the proposed class action settlement in this matter, and for preliminary approval of a settlement class. The proposed, nationwide settlement class involving 442,050 consumer, mortgage loans and their borrowers is defined as follows:

All persons who paid a fee to Carrington for making a mortgage loan payment by telephone, IVR, or via the internet, between January 1, 2016 through December 31, 2021 who fall into one or more of the following groups:

- (1) were borrowers on residential mortgage loans on properties located in California, Texas, New York, Maryland, or Florida;

(2) were borrowers on residential mortgage loans on properties in the United States to which Carrington acquired servicing rights when such loans were 30 days or more delinquent on loan payment obligations; or

(3) were borrowers on residential mortgage loans on properties located in the United States insured by the Federal Housing Administration.

In support of this motion, Plaintiffs refer the Court to the accompanying memorandum of law and attached declarations. Defendant Carrington Mortgage Services, LLC does not oppose this motion.

Dated: May 25, 2022

Respectfully submitted,

/s/ Hassan A. Zavareei
Hassan A. Zavareei
Kristen G. Simplicio
Dia Rasinariu
TYCKO & ZAVAREEI LLP
1828 L Street NW, Suite 1000
Washington, D.C. 20036
Telephone: 202-973-0900
Facsimile: 202-973-0950
hzavareei@tzlegal.com
ksimplicio@tzlegal.com
drasinariu@tzlegal.com

James L. Kauffman
BAILEY & GLASSER LLP
1055 Thomas Jefferson Street, NW
Washington, D.C. 20007
Telephone: (202) 463-2101
Facsimile: (202) 463-2103
jkauffman@baileyglasser.com

Phillip R. Robinson, Bar No. 27824
CONSUMER LAW CENTER LLC
10125 Colesville Road, Suite 378
Silver Spring, MD 20901
Telephone: (301) 448-1304
phillip@marylandconsumer.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing and attachments was sent to all parties and counsel of record when this motion was filed with the Court's ECF service.

/s/ Hassan A. Zavareei
Hassan A. Zavareei